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June 24, 2022

BY ECF

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

MEMO ENDORSED

Re: **USA v. Nadine Wade**
21-cr-472(KPF)

Dear Judge Failla,

As the Court is aware, I am CJA-appointed counsel for Nadine Wade. Ms. Wade requests a modification of her bail conditions that would allow her to reside in the Eastern District of Michigan at her sister's home.

Currently, Ms. Wade resides in the District of New Jersey and her bail conditions restrict her travel to the SDNY, EDNY and District of New Jersey (*see* Bail Conditions, dated June 3, 2021, attached hereto as Exhibit A). Ms. Wade must be out of her current residence by June 30, 2022. Her best available option is to move into her sister's home in the Eastern District of Michigan.

Specifically, Ms. Wade requests that she be permitted to move from the District of New Jersey, on or before June 30, 2022, to the Eastern District of Michigan, where she would reside at her sister's home. Further, Ms. Wade requests that her bail conditions be modified to restrict her travel to the Eastern and Western Districts of Michigan.

I have provided specific details of the move and contact information for Ms. Wade's sister to Pretrial Services. Further, I have discussed this request with Pretrial Services and the Government. Pretrial has no objection and the Government takes no position on this request.

Accordingly, I respectfully request that the Court issue an order permitting a modification of Ms. Wade's bail conditions that allows for her to move to the Eastern District of Michigan and to restrict her travel to the Eastern and Western Districts of Michigan.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'A. Bernstein', written over a horizontal line.

Andrew M. J. Bernstein, Esq.
ARMSTRONG TEASDALE LLP
Counsel for Nadine Wade

Application GRANTED. The conditions of Ms. Wade's pretrial release shall be modified to permit her to move from the District of New Jersey to the Eastern District of Michigan. Following her relocation, Ms. Wade's travel shall be restricted to the Eastern and Western Districts of Michigan, as well as to the Southern District of New York and any districts through which she must pass for permitted travel between the two states.

The Clerk of Court is directed to terminate the pending motion at docket entry 97.

Dated: June 24, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE